

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: STEEL ANTITRUST
LITIGATION**

Case No. 08-cv-5214

Honorable James B. Zagel

**THIS DOCUMENT RELATES TO ALL
DIRECT PURCHASER ACTIONS:**

Standard Iron Works v. ArcelorMittal, et al.,
Case No. 08-cv-5214

Wilmington Steel Processing Co., Inc. v.
ArcelorMittal, et al., **Case No. 08-cv-5371**

Capow, Inc. d/b/a Eastern States Steel v.
ArcelorMittal, et al., **Case No. 08-cv-5633**

Alco Industries, Inc. v. ArcelorMittal, et al.,
Case No. 08-cv-6197

Gulf Stream Builders Supply, Inc. v.
ArcelorMittal, et al., **Case No. 10-cv-4236**

**CLASS COUNSEL'S MOTION FOR AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF LITIGATION EXPENSES**

Class Counsel respectfully move this Court for an order (i) awarding Class Counsel attorneys' fees equal to one-third of the \$163.9 million common settlement funds recovered from Defendants ArcelorMittal, U.S. Steel, Commercial Metals, AK Steel and Gerdau; (ii) awarding reimbursement of \$5,471,759.05 in litigation costs and expenses; and (iii) directing Co-Lead Counsel to distribute attorneys' fees in a manner that, in the opinion of Co-Lead Class Counsel, fairly compensates each firm in view of its contribution to the prosecution of Plaintiffs' claims.

In support of this Motion, Class Counsel submit their accompanying Memorandum of Law, filed herewith, and incorporate by reference the facts and legal arguments set forth in the Memorandum of Law and accompanying exhibits.

Settling Defendants do not oppose this motion.

WHEREFORE, and for the reasons in the Memorandum of Law, Class Counsel respectfully request that the Court issue an Order awarding Class Counsel one-third of the \$163.9 million common settlement fund as a fair and reasonable attorney fee; awarding Class Counsel reimbursement of \$5,471,759.05 in litigation costs and expenses; and directing Co-Lead Counsel to allocate the attorneys' fee award in a reasonable manner consistent with Co-Lead Counsel's assessment of each firm's contribution to the prosecution of the case.

Dated: October 1, 2014

Respectfully submitted,

Michael K. Kellogg
Mark C. Hansen
Michael J. Guzman
Steven F. Benz
**KELLOGG, HUBER, HANSEN, TODD,
EVANS & FIGEL, P.L.L.C.**
Sumner Square
1615 M Street, NW, Suite 400
Washington, DC 20036
Tel.: (202) 326-7900

/s/ Jeffrey S. Istvan
Roberta D. Liebenberg
Donald L. Perelman
Jeffrey S. Istvan
Matthew Duncan
Adam J. Pessin
FINE, KAPLAN AND BLACK, R.P.C.
One South Broad Street, 23rd Floor
Philadelphia, PA 19107
Tel.: (215) 567-6565

Interim Co-Lead Counsel for Plaintiffs and the Proposed Class

Michael J. Freed
Steven A. Kanner
FREED KANNER LONDON & MILLEN LLC
2201 Waukegan Road, Suite 130
Bannockburn, IL 60015
Tel.: (224) 632-4500

Liaison Counsel for Plaintiffs and the Proposed Class

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of October, 2014, I caused a true and correct copy of the foregoing **Motion for Award of Attorneys' Fees and Reimbursement of Litigation Expenses** to be filed and served electronically via the Court's CM/ECF system upon all registered users.

/s/ Jeffrey S. Istvan
Jeffrey S. Istvan